

# DOWLAIS

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**Dowlais Group plc**

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**Water Policy**

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## **DOWLAIS GROUP PLC**

### **WATER POLICY**

#### **1. PURPOSE & SCOPE**

- 1.1 This policy sets out Dowlais Group plc's policy on water management and use. The purpose of this policy is to demonstrate the Group's commitment towards reducing the Group's water withdrawal and seeking to establish and implement best practice water stewardship methods.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own water-related policies and procedures reflecting their own operations and management structures, provided that they comply with the minimum standards of this policy.
- 1.4 This policy is adopted in accordance with our **Environmental Policy** (SUS-ENV-001).

#### **2. APPROVAL & RESPONSIBILITY**

- 2.1 This policy has been approved by the board of directors of Dowlais Group plc, who have ultimate responsibility for this policy and for ensuring it is adequately communicated to each Business Unit and the Group as a whole.
- 2.2 The CEO of each Business Unit is responsible for ensuring awareness of and compliance with this policy within their Business Unit and for establishing a "culture" of compliance. This includes ensuring effective dissemination of this policy throughout the Business Unit, providing relevant guidance and training, and appropriate safeguards, monitoring and resources.
- 2.3 All Employees are responsible for observing and complying with all applicable provisions of this policy and for avoiding any activity that might lead to, result in or suggest a breach of this policy.

#### **3. POLICY STATEMENT**

- 3.1 This policy sets out the Group's commitment to improve its water management practices by reducing water withdrawal and instilling responsible use of this scarce resource.
- 3.2 Water is often a fundamental part of the Group's operations and the communities in which the Group operates. The Group therefore recognises our role and responsibility relating to water by seeking to make educated and sustainable decisions relating to water.
- 3.3 In recognition of water as a scarce resource, the Group consults with relevant stakeholders to understand key environmental issues, aiming to help preserve this critical natural resource.
- 3.4 It is our policy to ensure that our Business Units understand how their business impacts water availability and quality and ultimately, reduce their water withdrawal.
- 3.5 Water is essential for a healthy economy, society, and environment. People across the world depend on it for their daily livelihoods, yet a large proportion of the world's population live in countries that are at risk of water stress and scarcity. The causes of water stress range from pollution of ground water, deforestation, drought, and poor waste management practices. Some of these are expected to deteriorate due to climate change and the Group recognises that its role as a corporate citizen is to operate good water stewardship practices.
- 3.6 For the Group, water stewardship means using water in a way that is environmentally sustainable and socially equitable. Appropriate water stewardship practices are only possible

through understanding how water is used, maintaining good water governance, monitoring water quality and identifying areas where water is scarce or at risk.

3.7 At a minimum, it is our policy to comply with relevant international and local legal obligations relating to water use, discharge, consumption and site-specific customer and certification requirements.

3.8 The remainder of this policy sets out specific ways in which the Group will seek to comply with these policy principles.

#### **4. MEASURING & MONITORING OF WATER**

The Group is committed to continuously improve data monitoring and collection processes across its operations to enable risk assessment of water impacts and dependencies across its value chains.

#### **5. WATER STRESS**

The Group recognises that its operations may be located in water stressed areas. The Group regularly reviews the proportion of its operations occurring in areas of high or extremely high-water stress and seeks to reduce water withdrawal in these regions.

#### **6. WATER RISK ASSESSMENTS**

6.1 It is the Group's policy to assess water-related risks as part of our operational risk assessments, with issues such as water quality, flood risk, access to Water, Sanitation and Hygiene (WASH) facilities and implications of water on our Business Unit's key commodities considered and aggregated into our the Group's assessment of its emerging and principal risks.

6.2 Each Business Unit must assess their impacts on water quality and availability, risks, and dependencies in the locations in which they operate.

6.3 By understanding these risks, the Group aims to implement appropriate water stewardship practices and seeks to reduce its dependency on water and the subsequent associated business impact of water availability and quality.

#### **7. WATER, SANITATION & HYGIENE IN THE WORKPLACE**

7.1 Safe drinking-water, sanitation and hygiene are crucial to human health, wellbeing and are a universal human right.

7.2 Safe water, sanitation and hygiene is not only a prerequisite to health, but contributes to livelihoods, helping to create healthy environments for resilient communities.

7.3 It is the Group's policy provide access to safely managed water, sanitation and hygiene services at all facilities.

#### **8. RAISING CONCERNS**

All Employees must raise concerns about any actual or suspected breaches of this policy at the earliest possible stage. This should be done in accordance with the processes set out in the Group's **Whistleblowing Policy** (LEG-COMPL-003).

#### **9. DEFINITIONS**

9.1 "**Business Unit**" means any business unit from time to time of the Group, including the central functions of the Group.

- 9.2 “**Employee**” means all employees or workers within the Group, which includes full time and part time employees and other workers including contractors, agency workers, interns, apprentices and volunteers.
- 9.3 “**Group**” means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.